



June 30, 1993

MP Done Simon  
HATS  
Due 8/9  
Beller

CERTIFIED MAIL

Regional Administrator  
United States Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

Re: USEPA HSWA Permit  
Lenox China, a division of Lenox, Inc.  
Tilton Road, Atlantic County, Pomona, N.J. 08240  
EPA I.D.: NJD 002325074

Dear Sir:

In accordance with Module IV-Waste Minimization of the above referenced HSWA permit, Lenox is submitting the following:

1. A waste minimization report in accordance with Module IV, A. The report is incorporated in the attached Waste Minimization Plan dated June 28, 1993.
2. A certification that a Waste Minimization Program is in place at the Lenox China, Pomona, N.J facility in accordance with Module IV, B.
3. The attached Waste Minimization Plan incorporates all of the elements specified in the Hazardous Waste Reduction Plan required by Module IV, C.

Should you have any questions concerning the above, please do not hesitate to contact me at (609) 484-9798.

Sincerely,

John F. Kinkela  
Director of Environmental Engineering

JFK/jfk  
Enclosures

PP1B

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US EPA

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cc w/encls: Mr. Andrew Park (1 copy)  
United States Environmental Protection Agency  
Air and Waste Management Division  
Hazardous Waste Facilities Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

United States Environmental Protection Agency (1 copy)  
Office of Policy and Management  
Permits Administration Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

Mr. Frank F. Faranca, (3 copies)  
Case Manager  
New Jersey Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
Bureau of Federal Case Management  
CN 028  
401 East State Street  
Trenton, New Jersey 08625-0028

LENOX CHINA, POMONA, N.J.

**WASTE MINIMIZATION CERTIFICATION**

I hereby certify that:

1. A program is in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by Lenox China, Pomona, N.J. to be economically practicable; and
2. The proposed method of treatment, storage or disposal is that practicable method currently available to Lenox China, Pomona, N.J. which minimizes the present and future threat to human health and the environment.

Name: Kenneth R. Clark  
Kenneth R. Clark

Title: Plant Manager

Date: June 30, 1993

166  
27 SEP 1993

Mr. John Kinkela  
Director of Environmental Engineering  
Lenox Technical Center  
65 Fire Road  
Absecon, New Jersey 08201

Re: Evaluation of Hazardous Waste Reduction Plan  
EPA I.D. #NJ002325074

Dear Mr. Kinkela:

The U.S. Environmental Protection Agency (EPA) is in receipt of your letter dated September 10, 1993 requesting an extension for submittal of the revised Hazardous Waste Reduction Plan (HWRP) for Lenox China Manufacturing Division. The revised HWRP will address EPA comments issued by letter dated August 20, 1993. The proposed date of November 30, 1993 for submittal of the revised HWRP is acceptable.

If you have any questions, please contact Vivian Chin, of my staff, at (212) 264-9539.

Sincerely yours,

Andrew Bellina, P.E.,  
Chief, Hazardous Waste Facilities Branch

cc: Frank Faranca, NJDEPE

bcc: Andrew Bellina, 2AWM-HWF  
Michael Poetzsch, 2AWM-HWF ✓  
Vivian Chin, 2AWM-HWF



July 28, 1995



Mr. Michael Poetzsch, P.E.  
Chief, New Jersey/Caribbean Permit Section  
United States Environmental Protection Agency - Region II  
290 Broadway  
New York, New York 10007-1866

Dear Mr. Poetzsch,

As discussed at our meeting on July 12, 1995 Lenox is submitting the current revision of its Hazardous Waste Reduction Plan (HWRP). The HWRP requires that review and revision be completed annually between July and the end of September in accordance with Section 5.4. Lenox has relied upon the advice provided by USEPA at the July 12 meeting and used the supplemental guidance provided by the USEPA to facilitate its review and revision. The points covered in the guidance document are addressed in order below:

1. Copies of the 1993 and 1994 SARA Title III, Form R's submitted for Lead and Zinc are attached for your reference. The Form R's include waste generation projections for the succeeding years and appropriate production activity indices for the reported year.
2. A block flow diagram has been added to the HWRP to present the waste generation manufacturing points and the complex internal recirculation required to make our high quality product at a reasonable cost. Glaze Preparation, Glazing and Decorating, the only processes which produce the Lead and Zinc wastes, are included. The process flow depicted is a highly integrated process. Typical of ceramic processes, changes at any point in the process must be appropriately compensated for in both the preceding and succeeding process steps to maintain overall yields. As I demonstrated in the July 12 meeting, this interrelation has been addressed in a mathematical model developed specifically to calculate and account for Lead and Zinc waste generation through mass balancing. As a result the model produces the waste quantities entered on each year's flow diagram. The quantities of waste actually generated are entered from waste manifests and discharge monitoring reports. Although the mathematical model has been refined over the years as additional documented measurements have confirmed previously estimated data, the original model has only required relatively insignificant modification. In summary, this flow diagram is a visual representation of the model.

Please note that both the Form R data and the model include the non-hazardous fugitive wastes generated in making china prior to Glazing and Decorating. In addition, periodic maintenance, reconstruction and decommissioning of equipment creates one time waste streams which are included in the totals shown on the flow diagram. Due to the rigorous entry of data into the model from actual waste tracking documents, large variations may be seen from year to year at specific waste generation points. However, the sources of these variations are clearly understood and accounted for with onetime patches added to the model.

3. To better explain the relation of Section 1 to Section 5, Sub-section 1.4 has been added to the HWRP to better explain the relation of each section to the HWRP and to each other.

Decals are items, usually produced by outside suppliers, which are incorporated into Lenox products. Lenox has limited knowledge of the amount of lead included in the production of these items. However, prior to being fired onto Lenox products, they are potentially unstable (see Section 1.2.3.1) and thus Lenox disposes of them as hazardous waste along with process contaminated rags, paper and dust collection cartridges. Decals are not included under total D008 from Fine China Glazing.

Rags, paper and dust collection cartridges are not suitable for delisting in the Enviro process (the commercial hazardous waste treatment and disposal firm utilized by Lenox) and are not included in the sludge with less than 30% lead. When it is appropriate, they are combined with F003 wastes as is now clearly shown in the process flow diagram.

4. The discrepancy between the tons of D008 waste and glaze sludge was the result of a typographical error that was not caught in editing the document. The current revised copy of the Waste Stream Priority list has corrected this typographical error.

5. As discussed during the July 12 meeting, the criteria used to select options of choice are developed on a case by case basis. In all cases, the preferred option is to eliminate the use of the hazardous material whenever its use is not inherent to the process or product and it is economically feasible. In that case there would be no need to consider other options. Managers at Pomona and all of our facilities have received copies of our corporate policy and have been advised that the ultimate objective is to eliminate all hazardous wastes.

6. Evaluation of anticipated reductions in wastes:

- Each of items 1 through 5 on the Current Waste Minimization Priority List produces a separate waste stream. Successful completion of an item will totally eliminate that item's waste stream. Items 1, 2 and 3 were successfully completed. Item 1 also eliminated the fugitive emissions.
- Items 6 and 7 would facilitate measurement and management of waste flows and handling costs, but would not in themselves minimize waste generation.
- Item 8 would have at most a 10% reduction impact on the generation of hazardous glaze wastes if item 3 could not be achieved.
- Item 9 only reduces water and energy waste.
- Item 10 has successfully eliminated the waste stream and any associated fugitive emissions.
- Item 11 has been eliminated but is kept on the list in case this process is again used at a future date.
- Item 12 would reduce hazardous glaze waste by at most 1%.
- Items 13 and 14 have successfully eliminated these waste streams in favor of recycle.
- Items 15, 16 and 17 would completely eliminate these waste streams in favor of recycle. (Note that Item 17 is eliminated if Item 3 is successfully completed.)
- Item 18 minimizes fugitive contamination of slip wastes by segregation.
- Item 19 reduces the toxicity of this waste stream.
- Item 20 successfully reduced the toxicity of this waste stream.

Waste stream elimination, minimization or toxicity reduction was the primary focus of the above twenty items. As a result, return on investment was not a significant criteria and for the two most costly items to implement, it is negative. (Although both may prove to have positive market impact for our product.)

Lenox has reviewed the general use of Table 2. It is only applicable to projects on a case by case basis and has been made available to the TQL teams.

7. A review of the Current Waste Minimization Priority List does not reveal any transference of hazardous waste into any other environmental media.

8. "TBE" is now defined in a note on the Current Waste Minimization List as "To Be Evaluated."

9. As discussed during the July 12 meeting, the most costly items to implement are clearly not the most technically and economically effective alternatives. They significantly increase the difficulty of producing high quality product and increase the costs of production and raw materials. However, there is absolutely no question that they are the most environmentally effective alternatives. Therefore, all other alternatives were rejected.

10. Lenox is committed to the HWRP, including the provision of adequate resources for implementation. A summary of the Lenox efforts in these areas, as discussed at the July 12 meeting follows:

- The HWRP presents the extensive history of waste minimization efforts at Lenox China as a basis for understanding the choices which have been made and guiding the choices which will be made.

- Waste minimization efforts at Lenox predate the development of guidelines by USEPA.

- Many of the option selections were made in the past and Lenox has already invested significant resources to develop the technology and processes required to implement these choices.

- To a significant degree, achieving these choices has required invention to an equal or greater extent than technological development.

- Due to Lenox's commitment to these choices, they have either already been implemented or are very close to implementation at this time.

- The equipment has either been purchased and installed or is in the process of being purchased.

- Where the technology was already available it was included in the design of the newer Lenox plants in North Carolina and has been or is being transferred to the Pomona, New Jersey plant.

11. Lenox is required to calculate activity based ratios for each Form R waste generated in the annual Generator, Right to Know and Toxic Chemical Inventory reports. The HWRP requires that process assessment teams use the same basis of measurement to implement the plan. This insures greater accuracy for the reports and provides a consistent basis for detailed evaluation of the effectiveness of the individual process changes.

12. A synopsis of the appropriate NJDEP document has been obtained for Appendix C. The NYSDEC checklist is included in the plan for its concise description of waste minimization for assessing individual processes.

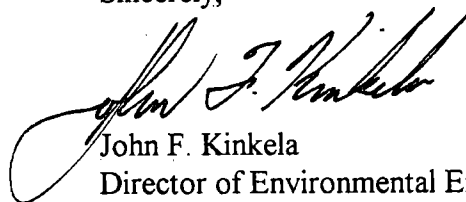
The effectiveness of the HWRP is best evaluated by its results. A Lenox review found that significant progress had been and continues to be made in accordance with the plans and goals of the original HWRP. Extensive consultation with various departments in our manufacturing facility was required to

reflect ongoing accomplishments and developmental changes in the plans and goals. Accordingly, the HWRP is now up to date and suitable for your review. Please note that the attached, updated plans and goals clearly show the progress being made under the plan. Lenox continues to be on track for achieving the major goals by the end of 1995.

I know that you and your staff respect Lenox concerns that detailed analyses of processes are highly proprietary and are not released beyond those within the company who have a need to know. In the hands of our competitors, even knowledge of the fact that Lenox is working on these projects could have substantial economic impact. Therefore, Lenox has invoked confidentiality for those portions of the plan which mention these projects.

Should you have any questions, please do not hesitate to contact me at (609) 484-9798.

Sincerely,



John F. Kinkela  
Director of Environmental Engineering

JFK/jfk  
Enclosures

cc: K.R. Clark  
J. H. Ennis  
L. A. Fantin  
N. Nahorniak

G.W. Berman, CE Consultants

cc: Mr. Andrew Park  
United States Environmental Protection Agency  
Air and Waste Management Division  
Hazardous Waste Facilities Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

Mr. Frank F. Faranca,  
Case Manager  
New Jersey Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
Bureau of Federal Case Management  
CN 028  
401 East State Street  
Trenton, New Jersey 08625-0028



16B  
FEB 11 1992

Mr. Stephen F. Lichenstein,  
Sr. Vice President, Secretary  
and General Counsel  
Lenox Incorporated  
100 Lenox Drive  
Lawrenceville, New Jersey 08648

Re: Lenox China, Inc., Tilton Road, Pomona, New Jersey  
EPA I.D. Number: NJD002325074

Dear Mr. Lichenstein:

This is in response to your facsimile transmittal dated January 4, 1993 in which you requested clarification of the due date of the Hazardous Waste Reduction Plan (HWRP) required by the above referenced facility's permit which was issued pursuant to the Resource Conservation and Recovery Act (RCRA) Hazardous and Solid Waste Amendments of 1984 (HSWA). In subsequent conversation with Patricia Pechko, of my staff, you also requested clarification of the Environmental Protection Agency's (EPA) coordination with New Jersey's Pollution Prevention Act.

Paragraph C of Module IV (Waste Minimization) of the Lenox China, Pomona HSWA Permit states "The Permittee shall submit a HWRP by July 1, of the first year following permit issuance..." As previously discussed with Ms. Pechko, on January 21, 1992, the HWRP would be due July 1, 1993 since the effective date of the permit is December 1, 1992.

EPA is aware of and appreciates the implications of the pending Pollution Prevention Plan (PPP) Lenox China will be submitting under the auspices of New Jersey's Pollution Prevention Act. Similarities may exist between what will be required of you under New Jersey's Act and EPA's HWRP requirements, however, please keep in mind that the required HWRP is based on RCRA and HSWA.

The HWRP minimum review standards were developed prior to, and independent of, New Jersey requirements. Therefore, the fact that Lenox will be required to submit a PPP in two years does not alleviate any HWRP reporting requirements at this time. In addition, there is no inconsistency between the HWRP and PPP requirements because the data developed by Lenox for the HWRP will be critically useful to the PPP as well.

HWRP requirements do not require the sharing of confidential process information. This type of confidential information is a New Jersey Pollution Prevention Act requirement. The requirements of the Pollution Prevention Act only apply to chemicals reported under Section 313 of the Emergency Planning and Community Right to Know Act (Title III of the Superfund Amendments and Reauthorization Act of 1986) which are manufactured or used in quantities exceeding 10,000 lbs. on a facility level. The HWRP pertains in any quantity only to hazardous waste generated at the Pomona facility.

I hope this clarifies differences between the HWRP and the New Jersey PPP. As previously mentioned, at such a time when a PPP is prepared, and approved by NJDEPE, a separate plan will not be needed to satisfy the requirements to prepare a HWRP. We look forward to receiving your HWRP by July 1, 1993.

If you have any questions, please contact Patricia Pechko, of my staff, at (212) 264-7462.

Sincerely yours,

Michael Poetzsch, P.E.  
Chief, New Jersey/Caribbean Permits Section

bcc: Michael Poetzsch, 2AWM-HWF  
Patricia Pechko, 2AWM-HWF  
Richard Yue, 2AWM-HWF ✓

**Hazardous Waste Reduction Plan (HWRP) Requirements Checklist**  
(FOR THE PREPARER)

The Hazardous and Solid Waste Amendments of 1984 require that generators of hazardous waste "have a program in place to reduce the volume and toxicity of waste generated to the extent that is economically practicable." The HWRP is the Permittee's waste minimization program and is intended to be an organized, comprehensive, and continual effort to systematically reduce waste generation. A component of a HWRP may include specific projects and may use waste minimization assessments as a tool for determining where and how waste can be reduced. The HWRP should reflect the goals and policies for waste minimization set by management. A waste minimization program should be an on-going effort and strive to make waste minimization part of the company's operating philosophy.

This checklist is based on the EPA guidance document, Waste Minimization Opportunity Assessment Manual. The Work Sheets referenced in this checklist are contained in this manual. (There are numerous Work Sheets in the manual that are also useful, but not referenced in this checklist.) The preparer of the HWRP is encouraged to consult this manual and other relevant guidance documents in designing a HWRP.

<u>Requirement</u>	<u>Description</u>
<b>1. <u>Waste minimization efforts already implemented or on-going at facility</u></b>	<b>1. This section should be used to summarize the waste minimization results of the previous year and describe changes (if any) to the Permittee's waste minimization program. The Permittee should provide a reasonable projection of next year's waste minimization objectives. The projections should be based on the waste minimization assessments discussed in Section 3. A five-year projection is desired, but not required. (The more accurate the projection the more efficient waste minimization program can be planned.)</b>
<b>a. Description of waste minimization activities since 1984. Include information on effectiveness of program in terms of waste generation and cost reduction achieved.</b>	
<b>b. On-going waste minimization program: description of current program and projected waste or toxicity reduction.</b>	
<b>c. Projections of waste generation and waste minimization for next five years.</b>	<b>This section can be viewed as an introduction to the HWRP--i.e., the Permittee's waste minimization program.</b>

## **2. Characterization of waste generation**

(Consult the Waste Minimization Opportunity Assessment Manual, EPA/625/7-88/003 and the New York Waste Reduction Guidance, March 1989.)

- a. Specify the Permittee's industry group code.
- b. Provide a description of the Permittee's waste accounting system. (Waste information should include, at a minimum, the waste types, amount, toxic components or hazardous constituents contained in the waste, chemical and physical characteristics, and dates generated.)
- c. Provide block and/or flow diagrams of the unit processes depicting the subject waste streams and methods of waste management.
- d. Identification of waste streams. (The preparer should refer to Work Sheets #6, #7, #8, #9 and #10 in the Waste Minimization Opportunity Assessment Manual for the type of information.)
  - Hazardous waste streams (as defined under RCRA)
  - Rationale for the material being a hazardous waste
- e. Prioritize the waste streams for waste minimization in accordance to the following criteria: (1) acute hazardous waste, (2) non-acute hazardous waste streams greater than 5 tons during the previous year or which accounts for at least 90% of all hazardous waste generated at the facility, and (3) remaining hazardous waste streams.
- f. Propose an "index" that relates hazardous waste generation to production. If waste stream cannot be related to in this manner, then propose other method of measuring the attainment of waste minimization objectives. (Consult the New York Waste Reduction Guidance, March 1989, Appendix A.)

2. This section should be used to identify and describe the hazardous wastes generated and targeted for waste minimization efforts. Knowledge of the wastes generated and the amount is essential in the development of a waste minimization program.

The Permittee should describe its waste accounting system or protocol designed to track waste generation by weight or volume. (Implementing a waste inventory system would lead to more efficient use of material, thus reducing the quantity of expired and unused material to be discarded.)

All hazardous waste streams subject to waste minimization should be identified. Simple block or flow diagrams identifying the waste streams should be included. (Note that a detailed flowsheet is generally not required, but may be included.) The Permittee should also determine whether the waste stream is hazardous because of being mixed with a hazardous waste stream. If it is, then a waste minimization option that must be considered in Section 3 shall be the segregation of the waste streams.

Upon developing an inventory list of the affected waste streams, the waste streams must be ranked by listing the streams in accordance to quantity generated in a year. The purpose of the ranking is to prioritize waste streams for aggressive waste minimization efforts. A phased approach in assessing the waste streams may be used.

Propose an "index" for measuring waste minimization progress. The Permittee should explore the use of various "indices" to obtain an effective "index" to measure waste minimization progress and effectiveness. Examples: quantity waste reduction per unit product produced (including rejected products) or raw material used. For complex cases where it is difficult to propose an "index", provide and explanation. (The intent is to develop an effective method to measure waste minimization progress.)

### **3. Assessment of waste minimization opportunities**

- a. Options Screened for Further Study. (Preparer should refer to Work Sheet #13.)
- b. Demonstrate that the following categories of waste reduction options were considered. Preparer should refer to Work Sheets #11 and #12.

(Consult New York State Waste Reduction Guidance Manual, March 1989 and relevant industry-specific material.)

- Source reduction
  - Equipment-related changes (e.g., segregation of waste streams, improvement in process, up-grading equipment)
  - Consider improvement to existing waste minimization program.
  - Describe protocol to review the processes and facility periodically for up-grade and improvement opportunities.
  - Personnel/Procedure-Related changes (e.g., house-keeping improvements, preventive maintenance)
  - Materials-related changes (e.g., improved inventory control, raw material substitution)
- Recycling/reuse
  - reuse for original purpose (e.g., close-loop reclamation)
  - use for lower-quality purpose
  - sell or exchange material (e.g., Waste Exchanges)
    - Which Waste Exchange(s) did Permittee consult?

#### **c. Feasibility Study of Options Resulting From the Screening:**

- Technical evaluation - Preparer should refer to Work Sheet #14.
- Economic evaluation- Preparer should refer to Work Sheets #15, #16, and #17.

### **3. This Section should be used to describe the results of the waste minimization opportunities assessment for each subject waste stream.**

To facilitate conducting a waste minimization opportunity assessment, it is recommended that the Permittee "track" the material that eventually winds up as waste--i.e., from loading dock to designating the material as "waste" and assess various points in the process for waste minimization. In addition, for facilities with an existing waste minimization program, one option that must be considered is improvement to the existing waste minimization activity. In the evaluation of options, the Permittee should consider various viable options. A source for such options can be national waste minimization databases, industry journals, EPA Office of Pollution Prevention, or universities.

For waste streams which must be assessed, but has not been assessed yet, provide a schedule to conduct the assessment.

The Permittee is not required to submit all information generated in the assessment process--only a summary of the assessment method and the results of the assessment. However, data relevant to the technical evaluation and feasibility study should be maintained on-site and made available upon request by EPA or State.

(The information submitted should be adequate to demonstrate that the items specified under Section 3 is addressed.)

- **Determination of true cost of waste**
  - **Consider cost of material found in waste stream based on purchase price**
  - **Consider cost of managing the waste: personnel, recordkeeping, transportation, liability insurance, pollution control, treatment and disposal, and compliance with regulations**
- **Does the selected option satisfy the following technical standards:**
  - **Apply generally accepted engineering, scientific or economic principles and practices.**
  - **Achievement of waste reduction must not be by transference to other environmental media without an environmental benefits from such transference.**
  - **Be consistent with the following hazardous waste management practice hierarchy: (1) source reduction, (2) recycling, (3) treatment, and then (4) disposal.**
  - **Does not involve conduct which is prohibited by any applicable law and regulation.**
  - **Provide a basis for charting waste reduction trends over time.**
  - **Apply those technically and economically feasible release reduction alternatives which are most effective in reducing the volume or toxicity of waste.**

(Table 1--Summary chart showing waste streams and selected options.)

**4. Implementation of waste minimization**

- a. Description of implementation procedures
  - Activities and equipment needed to implement HWRP
- b. Provide a detailed schedule showing critical milestones.
- c. Demonstrate a commitment of resources for implementing those technically and economically feasible waste reduction alternatives identified by the generator according to the time schedule developed.

**5. Encouraging technology transfer**

- a. Description of company protocol for internal exchange of information.
- b. Description of external exchange of information--e.g., EPA (e.g., EIES Database), State, universities, consultants.
- c. Description of training program to ensure that employees involved in waste minimization are kept current in waste minimization technologies.

4. This section should be used to describe implementation of the selected option, a schedule to implement the selected options, and/or a schedule to complete the assessment of remaining subject waste streams. (Section 4 may be combined with Section 3.)

5. This section should be used to describe the method of technology transfer. The description should address how personnel involved with waste minimization obtain relevant training, how relevant information is transferred in-house, how waste minimization suggestions are obtained and implemented, and how information is up-dated.

It is recommended that the Permittee have access to EPA's (or other) waste minimization databases. Regular contact with EPA and/or State is encouraged to obtain new information. Industry Journal is also a good source of obtaining new information on waste minimization.

For facilities with limited staff, there should be an appointed waste minimization "coordinator" who will be responsible for managing consultant/contractor support.

A waste minimization component may be incorporated into the Permittee's hazardous waste training program. Training of in-house waste minimization team should include a course on conducting waste minimization opportunity assessments.

**6. Provisions to conduct program evaluation**

- a. Description of protocol for periodic review of program effectiveness.
- b. Waste minimization progress should be tracked and evaluated.

It may be in the form of an annual report to Region II--(information to be included: Permittee's industrial group by SIC code, projected waste generation, actual waste generation, wastes reduced by implementation of waste reduction program, measurement of waste reduction (index), selected waste reduction technology, time frame covered by the annual report, difference in actual waste generation and projected waste generation and reason, and recommended changes to projection.)

- Does Waste Reduction Impact Statement demonstrate progress in waste reduction efforts employing the method of measurement specified in the plan?

6. This section should be used for describing the Permittee's schedule and method of evaluating its waste minimization program. It is recommended that its waste minimization program be evaluated at least every two years. The projections (Section 1 and 7) and annual reports should be considered in the evaluation. The Permittee should propose a criteria by which the waste minimization plan is deemed ineffective and, therefore, changes to the plan must be considered. (The criteria may be based on the Permittee's waste reduction projections and achievement as indicated by the annual report.)



**7. Waste Minimization Scope and Objectives and Demonstration of Top-level Management Support**

- a. Set specific goals and objectives (short term and long term) for hazardous waste volume and/or toxicity reduction.
- b. Demonstrate top-level management commitment of waste minimization.
- c. Description of method(s) used to accomplish top-level management support: e.g., reward and recognition program, waste minimization suggestion program.
- d. Is there a designated waste minimization department or team whose responsibility includes waste minimization?
- e. Is there a statement of its commitment to implement recommendations resulting from waste minimization assessments?
- f. Cost allocation
  - Are departments and managers charged "fully-loaded" waste management cost factoring in liability, compliance, and oversight?
  - Is budget to carry out waste minimization program adequate?

7. This section should be used to demonstrate top-level management support and to describe the managerial aspects of the waste minimization program (e.g., identify the designated waste minimization team or coordinator). Management support may be demonstrated by policy statement or directive committing the company to pursue waste minimization and declare its commitment to implement recommendations resulting from waste minimization assessments. (A company organization chart should be included.)

This section should discuss the Permittee's short-term and long-term objectives. (This should be consistent with Section 1.)

The Permittee should also describe how funding is allocated for implementation of the waste minimization program.

Recommended Minimum Standards  
Hazardous Waste Reduction Plan (HWRP) Evaluation Criteria

1. Introduction--Waste Minimization Efforts Already Implemented or On-going at the Facility

Minimum Standards:

The Permittee must provide its description of waste minimization efforts and total production for the previous year and projection for the next year.

2. Characterization of waste generation

Minimum Standards:

- a) The Permittee must describe its method for accounting of waste generation that is capable of measuring and recording waste generation by weight or volume.
- b) The Permittee must provide a block and/or flow diagrams which identifies the waste streams, the processes generating the waste streams, and the method of managing that waste stream.
- c) The Permittee must identify all hazardous waste streams and provide the characteristics and properties of each hazardous waste stream.
- d) The Permittee must list, in order of quantity and/or toxicity, the hazardous waste streams generated annually. (NYDEC's criteria may be used.)
- e) The Permittee must establish an index by which waste minimization progress can be measured for each subject waste stream. (See the HWRP Evaluation Criteria Checklist for examples of an index.)

3. Assessment of waste minimization opportunities

Minimum Standards:

- a) The Permittee must document that the following options were considered: (a) Source reduction and (b) Recycling/reuse
- b) The Permittee must describe its method for conducting the technical evaluation and feasibility study. (Only the description and results of the technical evaluation and feasibility study need to be submitted.)

c) The selected option must satisfy the following technical standards below:

- \* Apply generally accepted engineering, scientific or economic principles and practices.
- \* Achievement of waste reduction must not be by transference to other environmental media without an environmental benefit from such transference.
- \* Be consistent with the following hazardous waste management practices hierarchy: (1) source reduction, (2) recycling, (3) treatment, and (4) disposal.
- \* Does not involve conduct which is prohibited by any applicable law or regulations.
- \* Provide a basis for charting waste reduction trends over time.
- \* Apply those technically and economically feasible release reduction alternatives which are most effective in reducing the volume or toxicity of waste.

Note: If other technical alternatives are known to exist (e.g., from review of the EIES database) that can potentially increase waste minimization, then the response to the Permittee should include information on the technology and request that the company evaluate the system.

#### 4. Implementation of selected options

##### Minimum Standards:

The Permittee must include the waste reduction expected by implementation of the option and a schedule for implementation.

#### 5. Encouraging technology transfer

##### Minimum Standards:

The Permittee must have a personnel training program for the appropriate waste management personnel which includes training on how to assess waste minimization operations.

6. Provision to conduct program evaluation

Minimum Standards:

- a) The Permittee must evaluate the effectiveness (e.g., percent of waste reduction or equivalent) of its waste minimization program as compared to its original projections every two years. This evaluation must include a recommendation on whether to modify or continue implementing the HWRP.

7. Demonstration of top-level management support

Minimum Standards:

- a) The Permittee must provide documentation of its policy stating management's commitment to waste minimization.
- b) The Permittee must appoint a Waste Minimization Team or responsible coordinator.

In preparing a Hazardous Waste Reduction Plan (HWRP), the references below should be consulted.

## RESOURCES

### Conducting Waste Minimization Assessments

1. Waste Minimization Opportunity Assessment Manual, EPA/625/7-88/003, July 1988. Available through: U.S. EPA, Office of Research and Development, Cincinnati, Ohio 45268, tel. (513) 569-7562 or NTIS, 5285 Port Royal Road, Springfield, VA 22161, tel. (703) 487-4600.
2. Region II Hazardous Waste Reduction Plan Requirements Checklist. Available through U.S. EPA-Region II, Hazardous Waste Facilities Branch, Andrew Bellina, tel (212) 264-0505.
3. New York State Waste Reduction Guidance Manual, March 1989. New York State Waste Reduction Guidance Manual Supplement, December 1989. Available through the New York State Department of Environmental Conservation, Bureau of Pollution Prevention, 50 Wolf Road, Albany, New York 12233-7253, tel. (518) 485-8400. (This guidance is also recommended for Permittees located in Puerto Rico or New Jersey.)
4. 1989 Waste Minimization Report Instructions and Forms. Available through U.S. EPA-Region II.

### Waste Minimization Technologies and Case Studies

1. Pollution Prevention Information Exchange System (PIES), a service which is part of U.S. EPA's Pollution Prevention Information Clearinghouse (PPIC). Contact PPIC Technical Support Office at (703) 821-4800.
2. Pollution Prevention News, to be added on mailing list contact: Pollution Prevention News, U.S. EPA, 401 M Street SW (PM-219), Washington DC 20460.
3. Specific industry journal, waste management journals, or general engineering journal (e.g., Chemical Engineering, Pollution Engineering).
4. Pollution Prevention Resources and Training Opportunities in 1992. EPA/560/8-92-002, January 1992. Available through: U.S. EPA, Office of Pollution Prevention and Toxics (tel. 202-260-3557) and the Office of Environmental Engineering and Technology Demonstration (tel. 202-260-2600).

5. USER'S GUIDE: Strategic Waste Minimization Initiative (SWAMI) Version 2.0. EPA/625/11-91/004, January 1992. Available through: U.S. EPA, Office of Research and Development, Cincinnati, OH 45268. tel. (513) 569-7562.
6. Achievements in Source Reduction and Recycling for Ten Industries in the United States. EPA/600/2-91/051, September 1991. Available through: U.S. EPA, Office of Research and Development, Cincinnati, OH 45268. tel. (513) 569-7562.

# ROUTING AND TRANSMITTAL SLIP

Date

Initials

Date

01

1610

TO: (Name, office symbol, room number, building, Agency/Post)

- 1.
- 2.
- 3.
- 4.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

- PLS respond to the message on the cover sheet.  
 - They want to submit the HWRP @ a later date in accordance w/ NJ's W.M. law.  
 We had a similar situation w/ one of Virginia facilities - See her.  
 DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

message is legally for the use of the is not the intended on, distribution or have received this telephone and return ass above via the

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Phone No.

HWRP is due

The

92.

6041-102

OPTIONAL FORM 41 (Rev. 7-76)  
 Prescribed by GSA  
 FPMR (41 CFR) 101-11.206

TRANSMITTED BY: Chris

DATE: 01/04/93

TIME:

Please call sender at Lenox, Incorporated (609)-844-1310 or (609)-844-1310 if this fax message is received incomplete or not legible. Do this as soon as possible after the transmission is completed. Also, please call if for some reason the transmission stops due to technical problems.

THANK YOU FOR YOUR COOPERATION.



STEPHEN F. LICHTENSTEIN  
SENIOR VICE PRESIDENT  
SECRETARY AND  
GENERAL COUNSEL

## TELECOMMUNICATIONS COVER SHEET

DATE: 01/04/93  
DELIVER TO: Mike Poetzsch  
FROM: STEPHEN F. LICHTENSTEIN  
NUMBER OF PAGES (INCLUDING COVER SHEET) 3

The information contained in this facsimile message is legally privileged and confidential information intended only for the use of the addressee named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this telecopy is strictly prohibited. If you have received this telecopy in error, please immediately notify us by telephone and return the original message to us, at our cost, at the address above via the United States Postal Service. Thank you.

MESSAGE: Please give me a clarification of whether the HWRP is due  
July 1, 1993 or July 1, 1994 under the Permit. The  
effective date of the Permit is December 1, 1992.

TRANSMITTED BY: Chris  
DATE: 01/04/93 TIME: \_\_\_\_\_

Please call sender at Lenox, Incorporated (609)-844-1310 or (609)-844-1310 if this fax message is received incomplete or not legible. Do this as soon as possible after the transmission is completed. Also, please call if for some reason the transmission stops due to technical problems.

THANK YOU FOR YOUR COOPERATION.



MODULE IV - WASTE MINIMIZATION

- A. SUBMITTAL REQUIREMENTS. Pursuant to 40 C.F.R. § 264.73(b)(9), and Section 3005(h) of the Act, 42 U.S.C. § 6925(h), the Permittee must submit to the Regional Administrator, at least annually, a waste minimization report by the owner or operator. This report and all accompanying documentation will be submitted by July 1 of each year after the effective date of this Permit.
- B. WASTE MINIMIZATION REPORT. The Permittee must certify that:
1. A program is in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable; and
  2. The proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment.
- C. HAZARDOUS WASTE REDUCTION PLAN (HWRP). The Permittee shall submit a HWRP by July 1 of the first year following permit issuance. The HWRP shall be updated at least biennially to reflect changes in the HWRP, and submitted by July 1 of that year. The HWRP shall include at a minimum, the following information:
1. Identify amounts and types of all acute hazardous waste generated by waste stream.
  2. Identify amounts and types of non-acute hazardous waste by waste stream for streams greater than five (5) tons and,
  3. Identify at least 90% of all non-acute hazardous waste generated at the facility.
  4. Describe source of generation and waste management method for each waste stream.
  5. Provide list of technically feasible and economically practicable waste reduction measures.
  6. Provide a program plan and schedule for implementing technically feasible and economically practicable waste reduction over time.

The following guidance documents should be used in developing the HWRP:

Waste Minimization Opportunity Assessment Manual, EPA/625/7-88/003, July 1988. Available through: EPA, Office of Research and Development, Cincinnati, Ohio 45268, tel. 513/569-7562 or NTIS, 5285 Port Royal Road, Springfield, VA 22161, tel. 703/487-4600.

Region II HWRP Requirements. Available through EPA Region II, Hazardous Waste Facilities Branch, Andrew Bellina, tel. 212/264-0505.

New York State Waste Reduction Guidance Manual March 1989.

New York State Waste Reduction Guidance Manual Supplement, December 1990. Available through the New York State Department of Environmental Conservation, Bureau of Pollution Prevention, 50 Wolf Road, Albany, New York 12233-7253, tel. 518/485-8400.

D. IMPLEMENTATION OF WASTE REDUCTION TECHNIQUES.

The Permittee shall implement the feasible waste reduction techniques in accordance with the schedule in the HWRP.



16B  
*Mike*  
*pm*

STEPHEN F. LICHTENSTEIN  
SENIOR VICE PRESIDENT  
SECRETARY AND  
GENERAL COUNSEL

July 20, 1993

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Regional Administrator  
United States Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

Attention: Michael Poetzsch, P.E., Chief  
New Jersey/Caribbean Permit Section

Re: USEPA HSWA Permit  
Lenox China, a division of Lenox, Incorporated  
Tilton Road, Atlantic County, Pomona, New Jersey 08240  
EPA I.D.: NJD 002325074

Dear Sir:

By letter of June 30, 1993, John F. Kinkela, Director of Environmental Engineering for Lenox China, submitted to you a Waste Minimization Plan for Lenox China pursuant to Module IV-Waste Minimization of the current USEPA HSWA Permit. Inadvertently, certain pages of the Plan were included without being designated as "BUSINESS CONFIDENTIAL". In fact, they are BUSINESS CONFIDENTIAL and Lenox would be prejudiced substantially by the availability of such information to its competitors. In my telephone conversation yesterday morning with Michael Poetzsch, Chief, New Jersey/Caribbean Permit Section, he indicated that the Waste Minimization Plan probably has not been distributed yet and suggested that I send this letter requesting BUSINESS CONFIDENTIAL treatment. By this letter, I am requesting such treatment.

The tab in the Waste Minimization Plan captioned "MEASUREMENTS" contains the pages in question under the "WASTE MINIMIZATION PLAN SCHEDULE". I am enclosing copies of the schedule with the confidential materials deleted and a notation on the pages that the deleted information is BUSINESS CONFIDENTIAL. I also am enclosing pages with the information included and marked BUSINESS CONFIDENTIAL. I would appreciate your substituting the redacted pages in the Plan book and holding the confidential information separately pursuant to your




Page 2

procedures for BUSINESS CONFIDENTIAL information.

I would appreciate your confirming that this procedure is acceptable and that you will consider the redacted information as BUSINESS CONFIDENTIAL.

Very truly yours,

LENOX, INCORPORATED



Stephen F. Lichtenstein

SFL:ct

cc:

Mr. Andrew Park  
United States Environmental Protection Agency  
Air and Waste Management Division  
Hazardous Waste Facilities Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

United States Environmental Protection Agency  
Office of Policy and Management  
Permits Administration Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

Mr. Frank Faranca  
Case Manager  
New Jersey Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
Bureau of Federal Case Management  
CN 028  
401 East State Street  
Trenton, New Jersey 08625-0028

Gary W. Berman, P.E.  
John F. Kinkela

from the desk of

STEPHEN F. LICHTENSTEIN

These pages contain the **BUSINESS  
CONFIDENTIAL** information.

# WASTE MINIMIZATION PLAN SCHEDULE

June 28, 1993

DESCRIPTION OF OPPORTUNITY	RESPONSIBILITY	GOAL DATE	COMMENT
----------------------------	----------------	-----------	---------

## -- PRIORITIZED OPPORTUNITIES --

- |  |                     |         |           |
|--|---------------------|---------|-----------|
| 1. Eliminate TCE Degreaser Process - Special Etch                                | R&D/PROD            |         |           |
| Develop 90% of patterns  | R&D                 | Jun '93 | Completed |
| Decomission Acid Etch  | Env. Opns./Mfg.Eng. | Jun '93 |           |
| Install Special Etch Equipment in Plant  | R&D/Mfg. Eng.       | Jul '93 |           |
| Develop Balance of Patterns  | R&D                 | Dec '93 |           |
| 2. Substitute Lower Hazard Solvents For Precious Metal and Color Reclaim/Cleaner |                     |         |           |
| Develop Substitute Parts Cleaner for Machine Lining                              | Env.Opns./Prod      | Mar '93 | Completed |
| Develop Substitute Cleaners for Hand Lining, Silk Screen and Color               | Env.Opns./Prod      | Dec '93 |           |
| 3. SUBMITTED AS BUSINESS CONFIDENTIAL.   |                     |         |           |
| 4. Recycle Polishing Basin Sludge to a Portland Cement Manufacturer              |                     |         |           |
| Develop recycling source and obtain NJDEPE and EPA approval                      | Env.Eng.            | Jul '94 |           |

from the Desk of

STEPHEN F. LICHTENSTEIN

Please insert these pages in the  
Waste Minimization Plan Book in  
place of those pages now there.

## WASTE MINIMIZATION PLAN SCHEDULE

June 28, 1993

5. SUBMITTED AS BUSINESS CONFIDENTIAL.

6. Install Water Sub-metering for Departments Generating Industrial Waste

Install Sub-metering in 70% of Departments

Env.Opns./Maint.

Jul '93 90% Complete

Install Sub-metering in balance of Departments

Env.Opns./Maint.

Dec '93

-- UNRANKED OPPORTUNITIES --

7. Assign Trash, Recycling and Hazardous Waste Codes to Each Department

Feasibility study completed

Env.Opns./Acctg.

Nov '93

Manufacturing Departments budget for FY '95

Prod./Acctg

Dec '93

Start charging waste costs to Departments

Acctg./Env.OPns.

May '94

8. Reinstitute Collection, Storage and Reuse of Slip and Glaze Washdown Water

Feasibility study completed

Prod.

Jan '93

9. Utilize Treated TCE Plume Remediation Water for Irrigation, Cooling and Sanitary

Feasibility study completed

Fac.Eng.

Jul '93

10. Substitute Other Chemicals For Chloro/Fluorocarbon Solvents and Refrigerants

Feasibility study completed

Env.Opns./Fac.Eng.

Nov '93



## WASTE MINIMIZATION PLAN SCHEDULE

June 28, 1993

DESCRIPTION OF OPPORTUNITY	RESPONSIBILITY	GOAL DATE	COMMENT
1.			
2.			
3. Change Ivory Glaze Formulation to a Leadless Frit			
Develop leadless ivory glaze	R&D	May '93	90% Completed
Start leadless ivory glaze pilot production trials	R&D/Prod	Jul '93	Scheduled
Evaluate pilot production trials	Str.Com.	Nov '93	
Switch to leadless ivory glaze production	Prod	Apr '94	
Modify production lines for leadless ivory glaze	Mfg.Eng	Jan '94	
Remove all leaded materials and wastes from plant	Env.Opns./Prod	Jul '94	
4.			

## WASTE MINIMIZATION PLAN SCHEDULE

June 28, 1993

5. Develop Leadless Decals and Colors

Classify 90% of all decals as leadless or lead-containing

Classify remaining 10%

Develop leadless decals and colors:

-First 10%

-Another 20%

-Another 50%

-Remaining 20%

R&D

R&D

R&D

Jul '93 Completed

Dec '93

Jul '93 Completed

Dec '94

Dec '95

Dec '96

6.

7.

8.

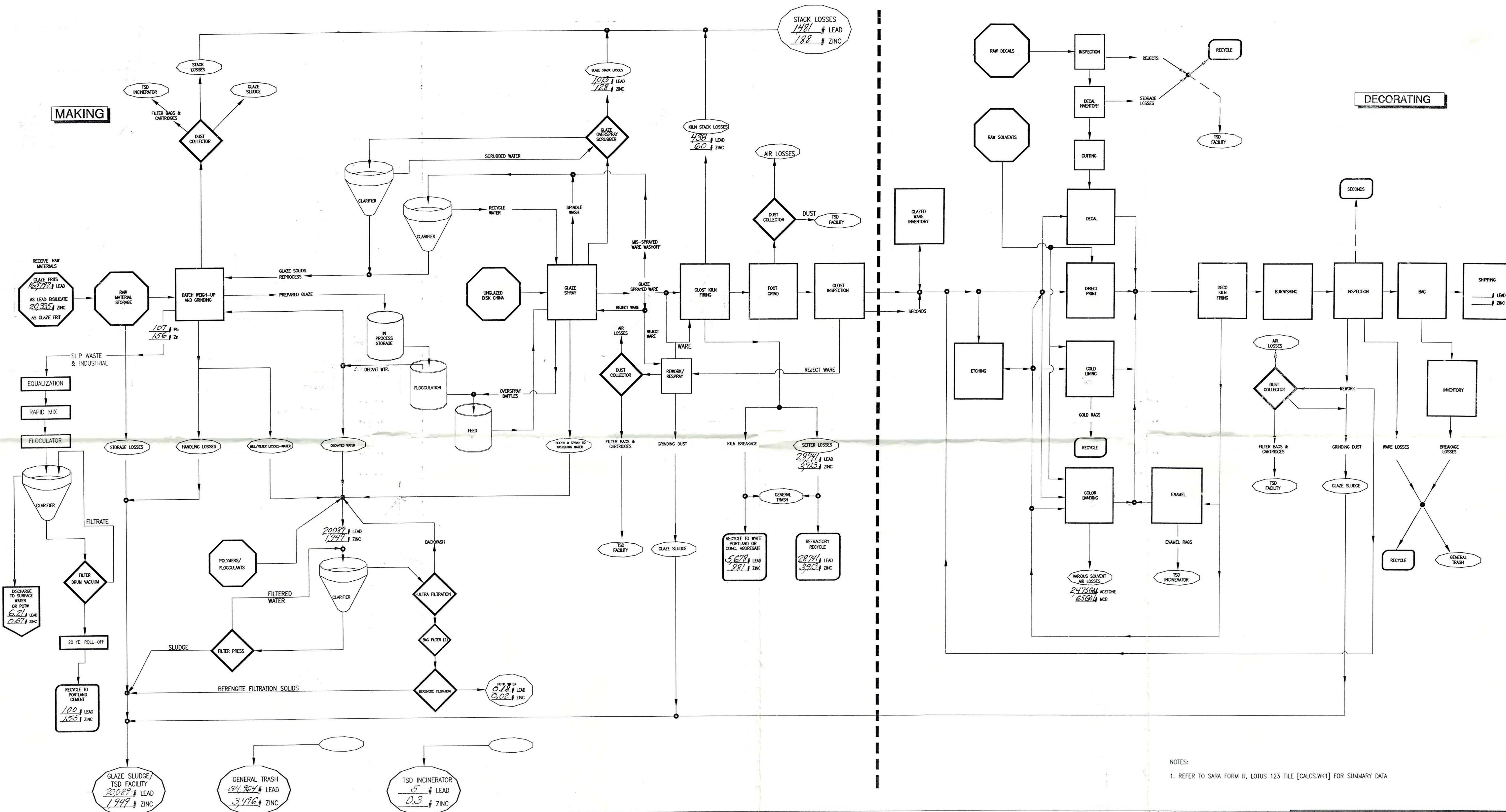
9.

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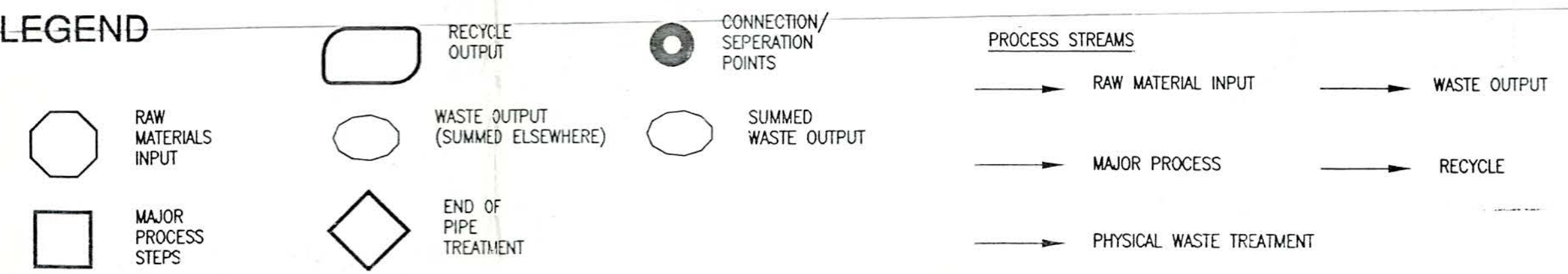
# MAKING

# DECORATING



NOTES:  
1. REFER TO SARA FORM R, LOTUS 123 FILE [CALCS.WK1] FOR SUMMARY DATA

## LEGEND



<b>LENOX CHINA</b> TILTON RD., POMONA N.J.	
PLANT POMONA TITLE WASTE MINIMIZATION PLAN SARA 313, FORM R PROCESS FLOW SCHEMATIC	DEPT. ENVIRONMENTAL FOR CALENDAR YR. 1995
DRN BURLINGAME SCALE: NONE FILE NO. P01115	PROJ ENGR. J.F. KINKELA DATE 6/8/95 SHT. 1 REV. 2

THE INFORMATION CONTAINED IN THIS DOCUMENT IS THE PROPERTY OF LENOX CHINA AND SHOULD NOT BE COPIED IN WHOLE OR IN PART, USED TO MANUFACTURE, TRANSMITTED OR LOANED TO ANY THIRD PARTY OR OTHERWISE DISCLOSED WITHOUT THE PRIOR WRITTEN CONSENT OF LENOX CHINA.





168  
150

State of New Jersey  
Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
CN 028  
Trenton, NJ 08625-0028

Scott A. Weiner  
Commissioner

Karl J. Delaney  
Director

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
NO. P 261 030 840

09 AUG RECD  
AUG 5 1993

United States Environmental Protection Agency  
Region II  
Jacob K. Javits Federal Building  
New York, New York 10278  
Attention: Mr. Michael Poetzsch

Dear Mr. Poetzsch:

Re: **Lenox China - Pomona**  
**Galloway Township, Atlantic County**  
**Waste Minimization Plan**

The New Jersey Department of Environmental Protection and Energy (Department) has reviewed the above referenced plan prepared by Lenox China and received on July 1, 1993. The Department has the following comment on the Waste Minimization Plan:

1. Appendix C - This appendix is titled NJDEPE Checklist. However, the text of the appendix contains a checklist prepared by New York State Department of Environmental Conservation, Bureau of Pollution Prevention. Please clarify this discrepancy.

If you have any questions, please contact me at (609) 633-1455.

Sincerely,

Frank Faranca, Project Manager  
Bureau of Federal Case Management

FFF

c: Andrew Park, USEPA, Region II  
Daryl Clark, NJDEPE/DPFSR/BGWPA

168  
20 AUG 1993

Mr. John Kinkela  
Director of Environmental Engineering  
Lenox Technical Center  
65 Fire Road  
Absecon, New Jersey 08201

Re: Evaluation of Hazardous Waste Reduction Plan  
EPA I.D. #NJDO02325074

Dear Mr. Kinkela:

The U.S. Environmental Protection Agency (EPA) has reviewed the Waste Minimization Plan dated June 28, 1993 which was submitted for Lenox China Manufacturing Division to meet the reporting requirements of a Hazardous Waste Reduction Plan (HWRP). The HWRP was reviewed for effectiveness and completeness of its description of your facility's waste minimization program.

Below are comments generated from the review, based on the current guidance, and should be viewed as supplemental guidance in preparing the HWRP:

- Waste generation projections for 1993 should be included with total production numbers for the previous year.
- A flow or block diagram should be included to describe the waste generation. The flow diagram should depict the "functional" sequence of events or actions. The diagram should depict the unit, process, operation or plant generating the waste stream. The diagram should include raw material inputs, major process steps/equipment, and product/waste outputs. This block diagram would facilitate the evaluation of waste reduction efforts.
- A narration of the operations at Lenox China is provided in Section 1, however, the Waste Stream Priority List in Section 5 should be tied to the generating process more clearly. For instance, the total 1992 generation of lead characteristic hazardous waste (D008) is discussed under Fine China Glazing, however, lead-containing decals are discussed under the Decoration process as a potential hazardous waste. Does this imply that even though the total D008 generation is shown under the Fine China Glazing process, that the number also includes D008 waste generated by the Decoration process?

Additionally, Section 4.3, Hazardous Waste Generation and Handling, indicates that waste decals are generally disposed of along with lead containing rags and paper and/or dust collection cartridges. Are the rags, etc., referred to included in the D008 described as sludge with less than 30% lead in the Waste Stream Priority List (Section 5), or is it included in waste rags and paper with waste solvents and colors described under the F003 waste stream? If it contains toxicity characteristic lead then it should be included with D008 waste and not F003 which is not apparent from the description. The HWRP would be more comprehensive if there were a clearer tie between these three separate sections of the plan.

- The Waste Stream Priority List shows that for 1992 there was 16.6 tons of D008 waste generated. However, the narrative states that 309,000 pounds of lead characteristic hazardous waste glaze sludge was generated in 1992, which translates to 154.5 tons. Please clarify.
- Lenox China should describe how the options of choice are selected and what other options were considered and rejected. How are various options screened and targeted for further studies?
- Provide an evaluation of the anticipated reduction (in pounds or other appropriate unit) in the amount of hazardous wastes produced by Lenox China as a result of the implementation of each waste reduction option. In addition, what is the return on investment for each modification? It is recommended that Table 2 of your Forms Section be completed.
- Provide an estimate to the extent, if any, to which the implementation of each of the technically feasible and economically practicable waste reduction options may result in the transference of hazardous waste into any other environmental media and the benefits, if any, of the waste reduction options resulting in such transference.
- Define TBE in the Current Waste Minimization List.
- The submitted information does not clearly show that the option-of-choice is the most effective technically and economically feasible waste reduction alternative. What are the other viable options which were rejected?
- A description of implementation of the options should include the equipment used and operating requirements and that adequate resources are committed to ensure that the waste minimization program will be implemented as planned.

- The HWRP indicates that waste minimization will be tracked by a ratio of pounds of waste throughput of each process with the pounds of waste generated by the process. This calculation should be provided for 1992 production and waste generation data as a demonstration of the index and to facilitate future comparison.
- Appendix C is titled NJDEPE Checklist. However, the text of the appendix contains a checklist prepared by the New York State Department of Environmental Conservation, Bureau of Pollution Prevention. Please clarify this discrepancy.

Please provide a proposed date for submittal of the revised HWRP, within 21 days of the date of this letter. If you have any questions, please contact Vivian Chin, of my staff, at (212) 264-9539.

Sincerely yours,

Andrew Bellina, P.E.  
Chief, Hazardous Waste Facilities Branch

cc: Frank Faranca, NJDEPE

bcc: Andrew Bellina, 2AWM-HWF  
Michael Poetzsch, 2AWM-HWF  
Vivian Chin, 2AWM-HWF  
Richard Yue, 2AWM-HWF

16A

(w/ comments)

20 AUG 1993

Mr. John Kinkela  
Director of Environmental Engineering  
Lenox Technical Center  
65 Fire Road  
Absecon, New Jersey 08201

Re: Evaluation of Hazardous Waste Reduction Plan  
EPA I.D. #NJDO02325074

Dear Mr. Kinkela:

The U.S. Environmental Protection Agency (EPA) has reviewed the Waste Minimization Plan dated June 28, 1993 which was submitted for Lenox China Manufacturing Division to meet the reporting requirements of a Hazardous Waste Reduction Plan (HWRP). The HWRP was reviewed for effectiveness and completeness of its description of your facility's waste minimization program.

Below are comments generated from the review, based on the current guidance, and should be viewed as supplemental guidance in preparing the HWRP:

Waste generation projections for 1993 should be included with total production numbers for the previous year. #①

A flow or block diagram should be included to describe the waste generation. The flow diagram should depict the "functional" sequence of events or actions. The diagram should depict the unit, process, operation or plant generating the waste stream. The diagram should include raw material inputs, major process steps/equipment, and product/waste outputs. This block diagram would facilitate the evaluation of waste reduction efforts. #②

1.23 A narration of the operations at Lenox China is provided in Section 1, however, the Waste Stream Priority List in Section 5 should be tied to the generating process more clearly. For instance, the total 1992 generation of lead characteristic hazardous waste (D008) is discussed under Fine China Glazing, however, lead-containing decals are discussed under the Decoration process as a potential hazardous waste. Does this imply that even though the total D008 generation is shown under the Fine China Glazing process, that the number also includes D008 waste generated by the Decoration process?



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The Waste Stream Priority List shows that for 1992 there was 16.6 tons of D008 waste generated. However, the narrative states that 309,000 pounds of lead characteristic hazardous waste glaze sludge was generated in 1992, which translates to 154.5 tons. Please clarify.

Lenox China should describe how the options of choice are selected and what other options were considered and rejected. How are various options screened and targeted for further studies?

Provide an evaluation of the anticipated reduction (in pounds or other appropriate unit) in the amount of hazardous wastes produced by Lenox China as a result of the implementation of each waste reduction option. In addition, what is the return on investment for each modification? It is recommended that Table 2 of your Forms Section be completed.

Provide an estimate to the extent, if any, to which the implementation of each of the technically feasible and economically practicable waste reduction options may result in the transference of hazardous waste into any other environmental media and the benefits, if any, of the waste reduction options resulting in such transference.

Define TBE in the Current Waste Minimization List.

The submitted information does not clearly show that the option-of-choice is the most effective technically and economically feasible waste reduction alternative. What are the other viable options which were rejected?

A description of implementation of the options should include the equipment used and operating requirements and that adequate resources are committed to ensure that the waste minimization program will be implemented as planned.

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° The HWRP indicates that waste minimization will be tracked by a ratio of pounds of waste throughput of each process with the pounds of waste generated by the process. This calculation should be provided for 1992 production and waste generation data as a demonstration of the index and to facilitate future comparison.

Appendix C is titled NJDEPE Checklist. However, the text of the appendix contains a checklist prepared by the New York State Department of Environmental Conservation, Bureau of Pollution Prevention. Please clarify this discrepancy.

Please provide a proposed date for submittal of the revised HWRP, within 21 days of the date of this letter. If you have any questions, please contact Vivian Chin, of my staff, at (212) 264-9539.

Sincerely yours,

Andrew Bellina, P.E.  
Chief, Hazardous Waste Facilities Branch

cc: Frank Faranca, NJDEPE

bcc: Andrew Bellina, 2AWM-HWF  
Michael Poetzsch, 2AWM-HWF  
Vivian Chin, 2AWM-HWF  
Richard Yue, 2AWM-HWF

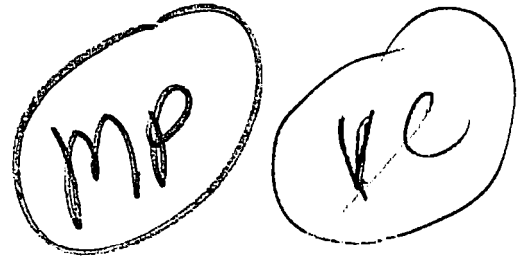
ENVIRONMENTAL PROTECTION  
AGENCY REGION II

93 SEP 16 PM 2:26

AWM-HAZ WASTE FAC. BRANCH



September 10, 1993



Mr. Andrew Bellina, PE  
Chief, Hazardous Waste Facilities Branch  
United States Environmental Protection Agency  
Region II  
Jacob K. Javits Federal Building  
New York, New York 10278-0012

Re: Letter dated August 25, 1993  
Evaluation of Hazardous Waste Reduction Plan  
EPA ID No. NJD 002325074

Dear Mr. Bellina,

In accordance with the referenced letter, Lenox is advising you of the proposed date for submittal of its revised Hazardous Waste Reduction Plan (HWRP). The plan requires that annual review and revision be completed between July and the end of September of each year in accordance with paragraph 5.3.3. Lenox could not begin its review process until your comments were received. As your comments were received August 25, Lenox proposes to submit its revised Hazardous Wasted Reduction Plan within ninety days, on or before November 30, 1993. This review will require extensive consultation with various departments in our manufacturing facility.

Should you have any questions concerning the above, please do not hesitate to contact me at (609) 484-9798.

Sincerely,

John F. Kinkela  
Director of Environmental Engineering

JFK/jfk  
Enclosures

cc: J. H. Ennis  
S. F. Lichtenstein

cc: Mr. Andrew Park  
United States Environmental Protection Agency  
Air and Waste Management Division  
Hazardous Waste Facilities Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

United States Environmental Protection Agency  
Office of Policy and Management  
Permits Administration Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

Regional Administrator  
United States Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

Mr. Frank F. Faranca,  
Case Manager  
New Jersey Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
Bureau of Federal Case Management  
CN 028  
401 East State Street  
Trenton, New Jersey 08625-0028

27 SEP 1993

Mr. John Kinkela  
Director of Environmental Engineering  
Lenox Technical Center  
65 Fire Road  
Absecon, New Jersey 08201

Re: Evaluation of Hazardous Waste Reduction Plan  
EPA I.D. #NJD002325074

Dear Mr. Kinkela:

The U.S. Environmental Protection Agency (EPA) is in receipt of your letter dated September 10, 1993 requesting an extension for submittal of the revised Hazardous Waste Reduction Plan (HWRP) for Lenox China Manufacturing Division. The revised HWRP will address EPA comments issued by letter dated August 20, 1993. The proposed date of November 30, 1993 for submittal of the revised HWRP is acceptable.

If you have any questions, please contact Vivian Chin, of my staff, at (212) 264-9539.

Sincerely yours,

Andrew Bellina, P.E.,  
Chief, Hazardous Waste Facilities Branch

cc: Frank Faranca, NJDEPE

bcc: Andrew Bellina, 2AWM-HWF  
Michael Poetzsch, 2AWM-HWF  
Vivian Chin, 2AWM-HWF

LENOX  
ENVIRONMENTAL PROTECTION  
AGENCY REGION II  
1995 JAN -9 PM 3:35

January 4, 1995 AWM-HAZ WASTE FAC. BRANCH

mf SA

Mr. Andrew Bellina, PE  
Chief, Hazardous Waste Facilities Branch  
United States Environmental Protection Agency  
Region II  
Jacob K. Javits Federal Building  
New York, New York 10278-0012

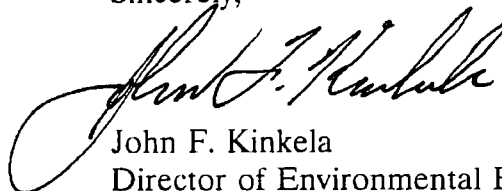
Re: Letter dated August 25, 1993  
Evaluation of Hazardous Waste Reduction Plan  
EPA ID No. NJD 002325074

Dear Mr. Bellina,

Lenox is advising you of the proposed date for submittal of its current Hazardous Waste Reduction Plan (HWRP). The plan requires that annual review and revision. This review required extensive consultation with Research and Development and various departments in our manufacturing facility. As a result it is currently undergoing review for signature following its recent revision. It will be available for submission by the end of January.

Should you have any questions concerning the above, please do not hesitate to contact me at (609) 484-9798.

Sincerely,

  
John F. Kinkela  
Director of Environmental Engineering

JFK/jfk

Enclosures

*w/o enclosures*  
*01/08/99 - KOM*

cc: J. H. Ennis

L.A. Fantin

16 B  
MAR 16 1995

Mr. John Kinkela  
Director of Environmental Engineering  
Lenox Technical Center  
65 Fire Road  
Absecon, New Jersey 08201

Re: Evaluation of Hazardous Waste Reduction Plan (HWRP)  
EPA I.D. #NJD002325074

Dear Mr. Kinkela:

On July 21, 1993 Lenox submitted to the U.S. Environmental Protection Agency (EPA) a HWRP dated June 28, 1993. EPA reviewed the plan, and responded by a letter dated August 20, 1993. The letter included several comments and recommendations generated from the review and request for submitting a revised HWRP. An agreement had been reached between EPA and Lenox to submit the revised HWRP on November 30, 1993. Lenox failed to submit the revised plan and did not provide an explanation for the delay.

On July 7, 1994, EPA received an update to Lenox's June 30, 1993 HWRP dated July 1, 1994 which did not address EPA's August 20, 1993 comments and recommendation. EPA did not accept the updated plan, and contacted Lenox via phone expressing the need for a revised HWRP. During the telephone conversations between Sam Abdellatif of my staff and yourself on December 1994 and January 4, 1995, you indicated that the revised HWRP will be available for submission by the end of January 1995. Subsequently, EPA received a letter dated January 4, 1995 from Lenox confirming the submittal date. However, EPA did not receive the revised HWRP as of today.

Since the June 30, 1993 and the July 1, 1994 HWRP submitted by Lenox did not meet EPA's minimum HWRP criteria; and Lenox had more than a year to submit a revised HWRP, Lenox still needs to submit a more descriptive revised plan in accordance to EPA's August 20, 1993 comments and recommendations by April 10, 1995. Failure to submit the requested information may result in EPA taking an enforcement action.

If you have any question, please contact Mr. Abdellatif at  
(212) 637-4103.

Sincerely yours,

Michael Poetzsch, P.E.  
Chief, New Jersey/Caribbean Permit Section

bcc: Andrew Bellina, 2AWM-HWF  
Michael Poetzsch, 2AWM-HWF  
Sam Abdellatif, 2AWM-HWF ✓



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II

163  
RECEIVED

See 161 5/2/95 J.C.

DATE: MAY 01 1995

SUBJECT: Hazardous Waste Reduction Plan for Lenox China, Inc., Pomona, New Jersey.

FROM: Andrew Bellina, P.E., Chief  
Hazardous Waste Facilities Branch (2AWM-HWF)

TO: George Meyer, P.E., Chief  
Hazardous Waste Compliance Branch (2AWM-HWC)

A HSWA permit was issued to Lenox China on December 1, 1992. Paragraph C of Module IV (Waste Minimization) of that HSWA permit states: "The permittee shall submit a Hazardous Waste Reduction Plan (HWRP) by July 1, of the first year following permit issuance." On July 21, 1993, Lenox submitted to EPA a HWRP dated June 28, 1993. We reviewed the plan, and responded by a letter dated August 20, 1993. The letter included several comments and recommendations generated from the review, and requested that Lenox submit a revised HWRP. An agreement had been reached between HWFB and Lenox to submit the revised HWRP on November 30, 1993. Lenox failed to submit the revised plan, and did not provide an explanation for the delay.

On July 7, 1994, we received an update to Lenox's June 30, 1993 HWRP dated July 1, 1994, which did not address our August 20, 1993 comments and recommendation. We did not accept the updated plan, and contacted Lenox via phone expressing the need for a revised HWRP. During December 1994 and January 4, 1995, telephone conversations between Sam Abdellatif of my staff and John Kinkela of Lenox, Mr. Kinkela indicated that the revised HWRP would be available for submission by the end of January 1995. Subsequently, we received a letter dated January 4, 1995 from Lenox confirming the submittal date, however, we did not receive the revised HWRP.

In addition, on March 16, 1995, we sent a letter to Lenox stating that Lenox must submit a revised HWRP by April 10, 1995, or EPA would consider taking an enforcement action. Again, we did not receive any response from Lenox as of today.

Based on the above, and since Lenox had more than a year to submit a revised HWRP, we would like your assistance in reviewing this matter and possibly taking an enforcement action against the facility.

If you or your staff have any questions, please contact Mr. Abdellatif at ext. 4103.

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LAVED  
HWFB  
CC: JG  
Due  
The permit  
Review  
an  
"possible"  
plan or  
HWRP  
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OK

Joel-

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Please review and let me  
know if this is the approach  
we should take.

K. Few.

Mr. John Kinkela  
Director of Environmental Engineering  
Lenox Technical Center  
65 Fire Road  
Absecon, New Jersey 08201

Re: Waste Minimization Plan  
Lenox China Manufacturing Division  
Ponoma, New Jersey  
EPA I.D. No. NJD002325074

Dear Mr. Kinkela:

This Notice of Violation is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recover Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984 42 U.S.C. § 6901, 6928.

Section 3006(b) of the Act, 42 U.S.C. § 6926 provides that the Administrator of the U.S. Environmental Protection Agency (EPA) may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the Federal program. The State of New Jersey received final authorization to administer its hazardous waste program in lieu of the Federal program on May 29, 1986. Section 3008(a) of the Act, 42 U.S.C. § 6928 authorizes EPA to enforce the provisions of the authorized State program.

However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal restrictions (LDR).

~~On December 1, 1993~~ On December 1, 1993 Lenox China was issued a HSWA permit by EPA. In accordance with Module IV of the permit Lenox was required to complete a Hazardous Waste Reduction Plan (HWRP) by July 1st of the following year (July 1, 1994). ~~Lenox has failed to submit an acceptable HWRP, as a result Lenox is in violations of the following:~~

(1) 40 CFR 264.73(b)(9)

A certification by the permittee no less often than annually, that the permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the permittee to be economically practicable; and the proposed method of treatment, storage or disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment.

On July 21, 1993 Lenox submitted the HWRP, and on August 20, 1993 EPA found the plan to be incomplete and requested a revised plan. On September 23, 1993 an agreement had been reached between EPA and Lenox to submit the revised HWRP on November 30, 1993. On July 7, 1994 EPA received a revised plan, which failed to address the comments presented in EPA's August 20, 1993 letter. On March 16, 1995 EPA sent ~~notice~~ requiring a revised HWRP to be submitted on or before April 10, 1995. As of this date EPA has not received a revised copy of Lenox's HWRP; therefore, Lenox has not complied with the permit certification requirements of having in place a Waste Reduction Plan to reduce the volume and toxicity of hazardous waste that it generates.

Be advised, EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 C.F.R. Part 264. You must submit, within fifteen (15) days of the receipt of this correspondence, the revised HWRP addressing comments from EPA's August 20, 1993 letter, and HWRP implementation report including waste reduction analysis.

Failure to comply and submit the documentation requested in this Notice of Violation subjects you and/or your company to the enforcement provisions of Section 3008 of RCRA, 42 U.S.C § 6928, including the imposition of penalties.

If you have any questions regarding this matter, please contact Kellyann Few, at (212) 637-3155.

Sincerely yours,

George C. Meyer, P.E., Chief  
Hazardous Waste Compliance Branch

cc: James Hamilton, Assistant Director  
Office of Enforcement Policy  
New Jersey Department of Environmental  
Protection and Energy

ENVIRONMENTAL PROTECTION  
AGENCY REGION II

1995 JUN 19 PM 3:16

AWM-HAZ WASTE FAC. BRANCH



June 16, 1995

16B  
SA

Mr. Michael Poetzsch, P.E.  
Chief, New Jersey/Caribbean Permit Section  
United States Environmental Protection Agency - Region II  
290 Broadway  
New York, New York 10007-1866

Re: HSWA Permit No. NJD002325074  
Lenox China, A Division of Lenox, Inc.  
Tilton Road, Atlantic County, Pomona, NJ 08240

Your letter of March 16, 1995

Dear Mr. Poetzsch,

This letter confirms our telephone conversation of June 2, 1995 in which you proposed setting up a meeting to discuss required revisions to the Lenox Hazardous Waste Minimization Plan. Lenox has been revising the plan on an ongoing basis and submitted a progress report July 1994. Another progress report update is due July 1, 1995. We agreed that Mr. Abdellatif will arrange a date for this meeting in the near future.

Should you have any questions concerning the above, please do not hesitate to contact me at (609) 484-9798.

Sincerely,

John F. Kinkela  
Director of Environmental Engineering

JFK/jfk

cc: Andrew Park, Case Manager  
New Jersey/Caribbean Permit Section  
United States Environmental Protection Agency - Region II  
290 Broadway  
New York, New York 10007-1866

Frank Faranca, Case Manager  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Remediation  
Bureau of Federal Case Management  
CN 028  
201 East State Street  
Trenton, New Jersey 08625-0028

Callahan w/act.

16B



July 25, 1996

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED # P 542 475 268**

Regional Administrator  
United States Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

Re: USEPA HSWA Permit  
Lenox Incorporated d/b/a Lenox China  
Tilton Road, Atlantic County, Pomona, NJ 08240  
EPA ID: NJD002325074

Dear Sirs:

In Accordance with Module IV - Waste Minimization of the above referenced HSWA permit, Lenox is submitting the following:

1. A certification that a Waste Minimization Program is in place at the Lenox China, Pomona, New Jersey facility in accordance with Module IV, B.
2. Updated copies of the Current Waste Minimization Priority List, the Waste Minimization Plan Schedule and the Waste Stream Priority List for 1995.

Please note that the attached List and Schedule are proprietary, **BUSINESS CONFIDENTIAL**, information and are therefore stamped **CONFIDENTIAL** and are not to be released without prior notification to/approval by Lenox, Incorporated. A second set of copies is included with the confidential materials deleted and a notation on the pages that the deleted information is **BUSINESS CONFIDENTIAL**. Please hold the confidential information separately pursuant to your procedures for **BUSINESS CONFIDENTIAL** information.

3. A copy of the 1995 Waste Minimization Plan Process Flow Schematic, Lenox Drawing No: P01115 which identifies the processes, sources and quantities for 90% of all types of non-acute hazardous waste streams.

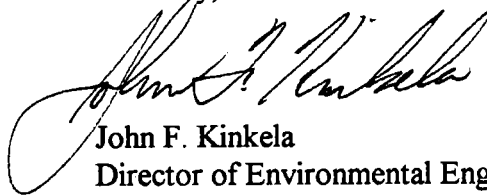
Should you have any questions concerning the above, please do not hesitate to contact me at (609) 484-9798.

US EPA  
96 JUL 30 PM 2:44

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12/15/98  
do cat

Sincerely,



John F. Kinkela

Director of Environmental Engineering

JFK/jfk

Enclosures: Updated 1995 HWRP lists and schedules  
Pomona Drawing. P01115

cc w/enclosures:

K. Clark  
J. Ennis  
L. Fantin

G. Berman, CE Consultants

Mr. Andrew Park (1 copy)  
United States Environmental Protection Agency  
Air and Waste Management Division  
Hazardous Waste Facilities Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

United States Environmental Protection Agency (1 copy)  
Office of Policy and Management  
Permits Administration Branch  
Region II  
26 Federal Plaza  
New York, New York 10278

Frank Faranca (3 copies)  
New Jersey Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
Bureau of Federal Case Management  
401 East State Street CN 028  
Trenton, New Jersey 08625-0028

LENOX CHINA, POMONA, N.J.

**WASTE MINIMIZATION CERTIFICATION**

I hereby certify that:

1. A program is in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by Lenox China, Pomona, N.J. to be economically practicable; and
2. The proposed method of treatment, storage or disposal is that practicable method currently available to Lenox China, Pomona, N.J. which minimizes the present and future threat to human health and the environment.

Name: Kenneth R. Clark

Kenneth R. Clark

Title: Plant Manager

Date: 7/25/96

OCT - 6 2004

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Louis A. Fantin  
Vice President  
Lenox Incorporated  
100 Lenox Drive  
Lawrenceville, NJ 08648

Re: Lenox Incorporated, Pomona, New Jersey  
EPA ID No.: NJD002325074

Dear Mr. Fantin:

Pursuant to the Government Performance and Results Act (GPRA), the U.S. Environmental Protection Agency (EPA) Region 2 is required to establish a baseline of operating and closed treatment, storage and disposal facilities regulated under Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA). As you know, your facility is currently one of 1,714 facilities nationwide on the 2005 RCRA GPRA corrective action baseline. This is to inform you that your facility will remain in the GPRA RCRA corrective action baseline for 2008, which becomes effective October 1, 2005. We are now providing notification to you because the list will soon be made available to the public.

Although the New Jersey Department of Environmental Protection (NJDEP) will continue as the lead for corrective action at your facility, EPA is responsible for tracking progress with regard to remediation and/or compliance monitoring for determining the effectiveness of the chosen remedies or stabilization measures (hereinafter referred to as the "GPRA RCRA corrective action baseline" or "baseline"), and for reporting this progress to the public.



EPA developed two "environmental indicators" to measure the success of cleanup efforts on the 2005 baseline. Those indicators are verifying that (1) current human exposures are controlled and (2) that there is no further migration of contaminated groundwater. EPA's goals for measuring progress under the 2005 GPRA baseline are as follows. For human health protection, by the year 2005, 95% of these RCRA facilities have current human exposures controlled. For groundwater protection, by the year 2005, 70% of these facilities have migration of contaminated groundwater under control.

For facilities on the 2008 baseline, these two environmental indicators will continue to be used for measuring success. The goal for the human health protection indicator remains at 95%. This is because EPA and the States have designated over 1900 high priority facilities nationwide for the 2008 baseline, which is an increase on the order of 200 facilities nationwide from the 2005 baseline. The goal for the groundwater protection indicator has been increased to 80%.

Additionally, for facilities on the 2008 RCRA GPRA corrective action baseline, EPA has established two additional measures for tracking progress. These measures are (1) the state or EPA formally selects a remedy(ies) for the entire facility for all media, designed to meet RCRA corrective action long-term goals; i.e., achieve long-term protection of human health, the environment, and groundwater, and (2) the state or EPA acknowledges that the facility has completed construction of said remedy(ies) for the entire facility for all media. EPA's goals for measuring progress under GPRA for these two additional measures are as follows. For the remedy selection measure, by the year 2008, the state or EPA will have made this determination for 30% of the facilities on the 2008 baseline. For the construction completed measure, by the year 2008, the state or EPA will have made this determination for 20% of the facilities on the 2008 baseline.

EPA will be working with NJDEP to assist your facility in meeting or maintaining positive determinations for each of these four measures of progress. Should you have any questions about the 2008 baseline, please contact Mr. Shane Nelson, of my staff, at 212-637-3130.

Sincerely yours,

Barry Tornick, Chief  
New Jersey Section  
RCRA Programs Branch

cc: Bruce Venner, BCM, NJDEP

bcc: Adolph Everett, 2DEPP-RPB  
Barry Tornick, 2DEPP-RPB  
Shane Nelson, 2DEPP-RPB

Document Transmittal Form

Facility Name LENOX INC.

EPA ID Number NJD 002325074

Date of document 10/6/04

Category 19A For "Correspondence" include: To LOUIS FANTIN

From B. ZERNICK

Subject ENV. INDICATORS

For "Other" category include: Description \_\_\_\_\_

For "Reports" include: Title \_\_\_\_\_

Author \_\_\_\_\_

Originated by Other Federal Facility \_\_\_\_\_ Confidential (Non CBI) \_\_\_\_\_ (include page #s \_\_\_\_\_) FOIA Exempt \_\_\_\_\_

Project Manager Signature 

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. LOUIS A. FANTIN  
VICE PRESIDENT  
LENOX INCORPORATED  
100 LENOX DRIVE  
LAWRENCEVILLE, NJ 08648

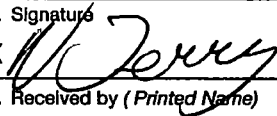
2. Article Number

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X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

10-12

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